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U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JACK ZINGERMAN,

Plaintiff,

vs.

FREEMAN DECORATING CO.,

Defendant.

NO.

02C

6050

JURY DEMAND

JUDGE COAR

MAGISTRATE JUDGE DENLOW

### COMPLAINT

Now comes Plaintiff, Jack Zingerman, (hereinafter referred to as "Zingerman") by Robert S. Pinzur, Elliott D. Hartstein, Laura E. Cohen, Barbara B. Bryan, Brian S. Brewer and Megan L. Kerr, of Pinzur & Hartstein, Ltd., his attorneys, demanding trial by jury, complaining against Defendant, Freeman Decorating Co. (hereinafter referred to as "Freeman"), and states:

#### COUNT I - DISCRIMINATION BASED ON RELIGION

1. This Court has jurisdiction of this case pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. Sec. 2000e, *et seq.*, The Illinois Human Rights Act (IHRA), 775 ILCS 5/1-101, *et seq.*; the First Amendment of the United States Constitution; Article I, Section 3, of the Illinois Constitution; the Religious Freedom Restoration Act of 1993 (RFRA) and Civil Rights Act of 1991 (hereinafter referred to as "Acts").
2. This action properly lies in this District pursuant to 28 U.S.C. Sec. 1391 because the claim arose in this Judicial District.
3. Zingerman's religion is Judaism.
4. Zingerman is a resident of Cook County, Illinois.
5. Zingerman was employed by Defendant, Freeman, from September, 1994 until he was involuntarily terminated on May 16, 2001.
6. During his employment with Freeman, Zingerman performed all material conditions and requirements of his positions, the last position being carpenter, in a satisfactory manner.
7. Many of Zingerman's co-workers used workbenches in the course of performing their jobs.
8. After Roger Lyons became Zingerman's Supervisor, Roger Lyons had the workbench which

Zingerman was using removed.

9. Roger Lyons told Zingerman "I hate the D.P. and Jew."
10. One of Zingerman's job responsibilities included working with an aluminum saw.
11. Roger Lyons told Zingerman that Zingerman could no longer work the saw and shortly thereafter gave that job to one of Roger Lyon's relatives.
12. Zingerman complained to Bill Casey, Zingerman's Union Agent, about the discrimination Zingerman was subjected to by Roger Lyons.
13. No action was taken by Bill Casey.
14. Zingerman complained to Tom Rockelman, Zingerman's Floor Manager, about the discrimination Zingerman was subjected to by Roger Lyons.
15. Tom Rockelman took Zingerman to speak to Harold (last name unknown), Zingerman's Branch Manager.
19. Zingerman complained to Harold (last name unknown), Branch Manager, about the discrimination Zingerman was subjected to by Roger Lyons.
20. No action was taken by Harold (last name unknown).
21. On May 29, 1998, Zingerman was injured on-the-job and required surgery as a result thereof. Following surgery, co-employee, Don Underwood, telephoned Zingerman, telling Zingerman that Zingerman should not return to work as Roger Lyons was going to make work difficult for Zingerman and that Roger had instructed Don Underwood not to help Zingerman.
22. Bill Casey, Zingerman's Union Agent, told Zingerman to forget about whatever had happened.
23. When Zingerman's doctor gave Zingerman permission to return to work following surgery, Roger Lyons told Zingerman there were no jobs available for Zingerman.
24. Zingerman subsequently needed a second surgery following Zingerman's May 29, 1998 on-the-job injury.
25. On May 16, 2001, Zingerman's doctor gave Zingerman permission to return to work. Zingerman was again informed by Roger Lyons there were no jobs available for Zingerman and Zingerman's employment was terminated.
26. Freeman engaged in the following behavior because of Zingerman's religion:
  - A. Removing Zingerman's workbench.

- B. Zingerman's Supervisor, Roger Lyons, told Zingerman "I hate the D.P. and Jew."
  - C. Zingerman complained to Bill Casey, Plaintiff's Union Agent, about the discrimination, but no action was taken by Bill Casey.
  - F. Zingerman complained to Harold (last name unknown), Branch Manager, about the discrimination, but no action was taken by Harold (last name unknown).
- 27. Freeman terminated Zingerman because of Zingerman's religion.
  - 28. Freeman interfered with Zingerman's ability to do his job.
  - 29. Zingerman opposed the discrimination.
  - 30. On May 16, 2001, Zingerman was terminated by Freeman without just cause.
  - 31. Zingerman has not received compensation from Freeman since the termination.
  - 32. As a result of the above described conduct, Zingerman has lost in excess of \$40,000.00 in income and benefits.
  - 33. As a result of the above described conduct, Zingerman has suffered anguish, emotional trauma, pain and suffering.
  - 34. As a result of the above described conduct, Zingerman has incurred substantial legal fees and costs in prosecution of this matter and will continue to incur substantial attorney fees and costs in the future which are anticipated to be in excess of \$50,000.
  - 35. Freeman is a corporation with its principal place of business in Cook County, Illinois.
  - 36. Freeman is engaged in manufacturing products which is an industry affecting commerce and, at all relevant times hereto, was an employer subject to the jurisdiction of this Court.
  - 37. Zingerman has complied with all administrative prerequisites by filing timely a Charge of Discrimination based on religion, national origin, retaliation and hostile work environment with the EEOC on January 14, 2002. A copy of the Charge is attached as Exhibit "A" and incorporated herein.
  - 38. Several days after May 29, 2002, Zingerman received a Determination And Notice Of Right To Sue from the EEOC. A copy of the Determination is attached as Exhibit "B" and incorporated herein.
  - 39. Zingerman was terminated by Freeman as a result of Zingerman's religion, being Jewish.
  - 40. Freeman had no legitimate reason for termination of Zingerman.

41. By terminating Zingerman, Freeman willfully and intentionally discriminated against Zingerman on the basis of his religion.
42. Further, by terminating Zingerman's employment, Defendant knew and/or showed reckless disregard for the matter of whether its conduct violated the Acts.
43. As a result of the unlawful and willful acts complained of herein, Zingerman has suffered loss of employment, wages, benefits and other compensation.
44. Zingerman was terminated by Employer as a result of Zingerman's religion.
45. Employer had no legitimate reason for termination of Zingerman.
46. By terminating Zingerman, Employer willfully and intentionally discriminated against Zingerman on the basis of his religion.
47. Further, by terminating Zingerman's employments, Defendant knew and/or showed reckless disregard for whether its conduct violated the Acts.
48. As a result of the unlawful and willful acts complained of herein, Zingerman has suffered loss of employments, wages, benefits and other compensation.

Wherefore, Zingerman respectfully requests this Court enter judgment granting Zingerman the following:

- A. Payment of all back pay, employee benefits and pension benefits in excess of \$40,000.00.
- B. Front pay and all prospective lost benefits.
- C. Compensatory damages of \$300,000 or more in actual damages for pain and suffering.
- D. Reinstatement to his prior position.
- E. Punitive damages of \$300,000 or more.
- F. An award for liquidated damages, attorney fees and costs and any other relief this Court deems appropriate.

## **COUNT II - DISCRIMINATION BASED ON NATIONAL ORIGIN**

1. This Court has jurisdiction of this case pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. Sec. 2000e, *et seq.*, The Illinois Human Rights Act (IHRA), 775 ILCS 5/1-101, *et seq.*; the First Amendment of the United States Constitution; Article I, Section 3, of the Illinois Constitution; the Religious Freedom Restoration Act of 1993 (RFRA) and Civil Rights Act of 1991 (hereinafter referred to as "Acts").

2. This action properly lies in this District pursuant to 28 U.S.C. Sec. 1391 because the claim arose in this Judicial District.
3. Zingerman's national origin is Russian.
4. Zingerman is a resident of Cook County, Illinois.
5. Zingerman was employed by Defendant, Freeman, from September, 1994 until he was involuntarily terminated on May 16, 2001.
6. During his employment with Freeman, Zingerman performed all material conditions and requirements of his positions, the last position being carpenter, in a satisfactory manner.
7. Zingerman's supervisor, Roger Lyons, treated Zingerman unfairly in that prior to becoming Zingerman's supervisor, Roger Lyons told a co-employee, Jerry Gordowicz, that when Roger Lyons became a Supervisor, Roger Lyons intended to "get rid of" a couple of D.P.s (Displaced Persons) including Zingerman, and give jobs to Roger Lyons's family and friends.
8. Many of Zingerman's co-workers used workbenches in the course of performing their jobs.
9. After Roger Lyons became Zingerman's Supervisor, Roger Lyons had the workbench which Zingerman was using removed and told Zingerman that "D.P.'s don't need benches."
10. Roger Lyons told Zingerman "I hate the D.P. and Jew."
11. One of Zingerman's job responsibilities included working with an aluminum saw.
12. Roger Lyons told Zingerman that Zingerman could no longer work the saw and shortly thereafter gave that job to one of Roger Lyons's relatives.
13. Zingerman has some difficulty reading and writing English. Roger Lyons was well aware of this and instructed other employees not to let anyone help Zingerman with tasks involving reading and writing English.
14. Zingerman complained to Bill Casey, Zingerman's Union Agent, about the discrimination Zingerman was subjected to by Roger Lyons.
15. No action was taken by Bill Casey.
16. Zingerman complained to Tom Rockelman, Zingerman's Floor Manager, about the discrimination Zingerman was subjected to by Roger Lyons.
17. Tom Rockelman took Zingerman to speak to Harold (last name unknown), Zingerman's Branch Manager.
19. Zingerman complained to Harold (last name unknown), Branch Manager, about the

discrimination Zingerman was subjected to by Roger Lyons.

20. No action was taken by Harold (last name unknown).
21. On May 29, 1998, Zingerman was injured on-the-job and required surgery as a result thereof. Following surgery, co-employee, Don Underwood, telephoned Zingerman, telling Zingerman that Zingerman should not return to work as Roger Lyons was going to make work difficult for Zingerman and that Roger had instructed Don Underwood not to help Zingerman.
22. Bill Casey, Zingerman's Union Agent, told Zingerman to forget about whatever had happened.
23. When Zingerman's doctor gave Zingerman permission to return to work following surgery, Roger Lyons told Zingerman there were no jobs available for Zingerman.
24. Zingerman subsequently needed a second surgery following Zingerman's May 29, 1998 on-the-job injury.
25. On May 16, 2001, Zingerman's doctor gave Zingerman permission to return to work. Zingerman was again informed by Roger Lyons there were no jobs available for Zingerman and Zingerman's employment was terminated.
26. Freeman engaging in the following behavior because of Zingerman's national origin:
  - A. Removing Zingerman's workbench.
  - B. Telling Zingerman "D.P.s (Displaced Persons) don't need benches."
  - C. Zingerman's Supervisor, Roger Lyons, told Zingerman "I hate the D.P. and Jew."
  - D. Zingerman's Supervisor, Roger Lyons, knew Zingerman had some difficulty reading and writing English and instructed other employees not to help Zingerman with tasks involving reading and writing English.
  - E. Zingerman complained to Bill Casey, Plaintiff's Union Agent, about the discrimination, but no action was taken by Bill Casey.
  - F. Zingerman complained to Harold (last name unknown), Branch Manager, about the discrimination, but no action was taken by Harold (last name unknown).
27. Freeman terminated Zingerman because of Zingerman's national origin.
28. Freeman interfered with Zingerman's ability to do his job.
29. Zingerman opposed the discrimination.

30. On May 16, 2001, Zingerman was terminated by Freeman without just cause.
31. Zingerman has not received compensation from Freeman since the termination.
32. As a result of the above described conduct, Zingerman has lost in excess of \$40,000.00 in income and benefits.
33. As a result of the above described conduct, Zingerman has suffered anguish, emotional trauma, pain and suffering.
34. As a result of the above described conduct, Zingerman has incurred substantial legal fees and costs in prosecution of this matter and will continue to incur substantial attorney fees and costs in the future which are anticipated to be in excess of \$50,000.
35. Freeman is a corporation with its principal place of business in Cook County, Illinois.
36. Freeman is engaged in manufacturing products which is an industry affecting commerce and, at all relevant times hereto, was an employer subject to the jurisdiction of this Court.
37. Zingerman has complied with all administrative prerequisites by filing timely a Charge of Discrimination based on religion, national origin, retaliation and hostile work environment with the EEOC on January 14, 2002. A copy of the Charge is attached as Exhibit "A" and incorporated herein.
38. Several days after May 29, 2002, Zingerman received a Determination And Notice Of Right To Sue from the EEOC. A copy of the Determination is attached as Exhibit "B" and incorporated herein.
39. Zingerman was terminated by Freeman as a result of Zingerman's national origin, being Russian.
40. Freeman had no legitimate reason for termination of Zingerman.
41. By terminating Zingerman, Freeman willfully and intentionally discriminated against Zingerman on the basis of his national origin.
42. Further, by terminating Zingerman's employment, Defendant knew and/or showed reckless disregard for the matter of whether its conduct violated the Acts.
43. As a result of the unlawful and willful acts complained of herein, Zingerman has suffered loss of employment, wages, benefits and other compensation.
44. Zingerman was terminated by Employer as a result of Zingerman's national origin.
45. Employer had no legitimate reason for termination of Zingerman.
46. By terminating Zingerman, Employer willfully and intentionally discriminated against



Zingerman on the basis of his national origin.

47. Further, by terminating Zingerman's employments, Defendant knew and/or showed reckless disregard for whether its conduct violated the Acts.
48. As a result of the unlawful and willful acts complained of herein, Zingerman has suffered loss of employments, wages, benefits and other compensation.

Wherefore, Zingerman respectfully requests this Court enter judgment granting Zingerman the following:

- A. Payment of all back pay, employee benefits and pension benefits in excess of \$40,000.00.
- B. Front pay and all prospective lost benefits.
- C. Compensatory damages of \$300,000 or more in actual damages for pain and suffering.
- D. Reinstatement to her prior position.
- E. Punitive damages of \$300,000 or more.
- F. An award for liquidated damages, attorney fees and costs and any other relief this Court deems appropriate.

### **COUNT III - HOSTILE WORK ENVIRONMENT**

1. This Court has jurisdiction of this case pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. Sec. 2000e, *et seq.*, The Illinois Human Rights Act (IHRA), 775 ILCS 5/1-101, *et seq.*; the First Amendment of the United States Constitution; Article I, Section 3, of the Illinois Constitution; the Religious Freedom Restoration Act of 1993 (RFRA) and Civil Rights Act of 1991 (hereinafter referred to as "Acts").
2. This action properly lies in this District pursuant to 28 U.S.C. Sec. 1391 because the claim arose in this Judicial District.
3. Zingerman's religion is Judaism.
4. Zingerman's national origin is Russian.
5. Zingerman is a resident of Cook County, Illinois.
6. Zingerman was employed by Defendant, Freeman, from September, 1994 until he was involuntarily terminated on May 16, 2001.
7. During his employment with Freeman, Zingerman performed all material conditions and



requirements of his positions, the last position being carpenter, in a satisfactory manner.

8. Zingerman's supervisor, Roger Lyons, treated Zingerman unfairly in that prior to becoming Zingerman's supervisor, Roger Lyons told a co-employee, Jerry Gordowicz, that when Roger Lyons became a Supervisor, Roger Lyons intended to "get rid of" a couple of D.P.s (Displaced Persons) including Zingerman, and give jobs to Roger Lyons's family and friends.
9. Many of Zingerman's co-workers used workbenches in the course of performing their jobs.
10. After Roger Lyons became Zingerman's Supervisor, Roger Lyons had the workbench which Zingerman was using removed and told Zingerman that "D.P.'s don't need benches."
11. Roger Lyons told Zingerman "I hate the D.P. and Jew."
12. One of Zingerman's job responsibilities included working with an aluminum saw.
13. Roger Lyons told Zingerman that Zingerman could no longer work the saw and shortly thereafter gave that job to one of Roger Lyons's relatives.
14. Zingerman has some difficulty reading and writing English. Roger Lyons was well aware of this and instructed other employees not to let anyone help Zingerman with tasks involving reading and writing English.
15. Zingerman complained to Bill Casey, Zingerman's Union Agent, about the discrimination Zingerman was subjected to by Roger Lyons.
16. No action was taken by Bill Casey.
17. Zingerman complained to Tom Rockelman, Zingerman's Floor Manager, about the discrimination Zingerman was subjected to by Roger Lyons.
18. Tom Rockelman took Zingerman to speak to Harold (last name unknown), Zingerman's Branch Manager.
19. Zingerman complained to Harold (last name unknown), Branch Manager, about the discrimination Zingerman was subjected to by Roger Lyons.
20. No action was taken by Harold (last name unknown).
21. On May 29, 1998, Zingerman was injured on-the-job and required surgery as a result thereof. Following surgery, co-employee, Don Underwood, telephoned Zingerman, telling Zingerman that Zingerman should not return to work as Roger Lyons was going to make work difficult for Zingerman and that Roger had instructed Don Underwood not to help Zingerman.
22. Bill Casey, Zingerman's Union Agent, told Zingerman to forget about whatever had happened.

23. When Zingerman's doctor gave Zingerman permission to return to work following surgery, Roger Lyons told Zingerman there were no jobs available for Zingerman.
24. Zingerman subsequently needed a second surgery following Zingerman's May 29, 1998 on-the-job injury.
25. On May 16, 2001, Zingerman's doctor gave Zingerman permission to return to work. Zingerman was again informed by Roger Lyons there were no jobs available for Zingerman and Zingerman's employment was terminated.
26. Freeman acted to create and maintain a hostile work environment for Zingerman because of Zingerman's religion, national origin and opposition to discrimination, by engaging in the following behavior:
  - A. Removing Zingerman's workbench.
  - B. Telling Zingerman "D.P.s (Displaced Persons) don't need benches."
  - C. Zingerman's Supervisor, Roger Lyons, told Zingerman "I hate the D.P. and Jew."
  - D. Zingerman's Supervisor, Roger Lyons, knew Zingerman had some difficulty reading and writing English and instructed other employees not to help Zingerman with tasks involving reading and writing English.
  - E. Zingerman complained to Bill Casey, Plaintiff's Union Agent, about the discrimination, but no action was taken by Bill Casey.
  - F. Zingerman complained to Harold (last name unknown), Branch Manager, about the discrimination, but no action was taken by Harold (last name unknown).
27. Freeman terminated Zingerman because of Zingerman's religion and national origin.
28. Freeman created a hostile work environment and interfered with Zingerman's ability to do his job.
29. Zingerman opposed the discrimination.
30. On May 16, 2001, Zingerman was terminated by Freeman without just cause.
31. Zingerman has not received compensation from Freeman since the termination.
32. As a result of the hostile work environment, Zingerman has lost in excess of \$40,000.00 in income and benefits.
33. As a result of the hostile work environment, Zingerman has suffered anguish, emotional trauma, pain and suffering.

34. As a result of the hostile work environment, Zingerman has incurred substantial legal fees and costs in prosecution of this matter and will continue to incur substantial attorney fees and costs in the future which are anticipated to be in excess of \$50,000.
35. Freeman is a corporation with its principal place of business in Cook County, Illinois.
36. Freeman is engaged in manufacturing products which is an industry affecting commerce and, at all relevant times hereto, was an employer subject to the jurisdiction of this Court.
37. Zingerman has complied with all administrative prerequisites by filing timely a Charge of Discrimination based on religion, national origin, retaliation and hostile work environment with the EEOC on January 14, 2002. A copy of the Charge is attached as Exhibit "A" and incorporated herein.
38. Several days after May 29, 2002, Zingerman received a Determination And Notice Of Right To Sue from the EEOC. A copy of the Determination is attached as Exhibit "B" and incorporated herein.
39. Zingerman was terminated by Freeman as a result of Zingerman's religion, being Jewish.
40. Freeman had no legitimate reason for termination of Zingerman.
41. By terminating Zingerman, Freeman willfully and intentionally discriminated against Zingerman on the basis of his religion.
42. Further, by terminating Zingerman's employment, Defendant knew and/or showed reckless disregard for the matter of whether its conduct violated the Acts.
43. As a result of the unlawful and willful acts complained of herein, Zingerman has suffered loss of employment, wages, benefits and other compensation.
44. Zingerman was terminated by Employer as a result of Zingerman's religion and national origin.
45. Employer had no legitimate reason for termination of Zingerman.
46. By terminating Zingerman, Employer willfully and intentionally discriminated against Zingerman on the basis of his religion and/or national origin.
47. Further, by terminating Zingerman's employments, Defendant knew and/or showed reckless disregard for whether its conduct violated the Acts.
48. As a result of the unlawful and willful acts complained of herein, Zingerman has suffered loss of employments, wages, benefits and other compensation.

Wherefore, Zingerman respectfully requests this Court enter judgment granting Zingerman

the following:

- A. Payment of all back pay employee benefits and pension benefits in excess of \$40,000.00.
- B. Front pay and all prospective lost benefits.
- C. Compensatory damages of \$300,00.00 or more in actual damages for pain and suffering.
- D. Reinstatement to his prior position.
- E. Punitive damages of \$300,000.00 or more.
- F. An award for liquidated damages, attorney fees and costs and any other relief this Court deems appropriate.

#### **COUNT IV - RETALIATION**

1. This Court has jurisdiction of this case pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. Sec. 2000e, *et seq.*, The Illinois Human Rights Act (IHRA), 775 ILCS 5/1-101, *et seq.*; the First Amendment of the United States Constitution; Article I, Section 3, of the Illinois Constitution; the Religious Freedom Restoration Act of 1993 (RFRA) and Civil Rights Act of 1991 (hereinafter referred to as "Acts").
2. This action properly lies in this District pursuant to 28 U.S.C. Sec. 1391 because the claim arose in this Judicial District.
3. Zingerman's religion is Judaism.
4. Zingerman's national origin is Russian.
5. Zingerman is a resident of Cook County, Illinois.
6. Zingerman was employed by Defendant, Freeman, from September, 1994 until he was involuntarily terminated on May 16, 2001.
7. During his employment with Freeman, Zingerman performed all material conditions and requirements of his positions, the last position being carpenter, in a satisfactory manner.
8. Zingerman's supervisor, Roger Lyons, treated Zingerman unfairly in that prior to becoming Zingerman's supervisor, Roger Lyons told a co-employee, Jerry Gordowicz, that when Roger Lyons became a Supervisor, Roger Lyons intended to "get rid of" a couple of D.P.s (Displaced Persons) including Zingerman, and give jobs to Roger Lyon's family and friends.
9. Many of Zingerman's co-workers used workbenches in the course of performing their jobs.

10. After Roger Lyons became Zingerman's Supervisor, Roger Lyons had the workbench which Zingerman was using removed and told Zingerman that "D.P.'s don't need benches."
11. Roger Lyons told Zingerman "I hate the D.P. and Jew."
12. One of Zingerman's job responsibilities included working with an aluminum saw.
13. Roger Lyons told Zingerman that Zingerman could no longer work the saw and shortly thereafter gave that job to one of Roger Lyon's relatives.
14. Zingerman has some difficulty reading and writing English. Roger Lyons was well aware of this and instructed other employees not to let anyone help Zingerman with tasks involving reading and writing English.
15. Zingerman complained to Bill Casey, Zingerman's Union Agent, about the discrimination Zingerman was subjected to by Roger Lyons.
16. No action was taken by Bill Casey.
17. Zingerman complained to Tom Rockelman, Zingerman's Floor Manager, about the discrimination Zingerman was subjected to by Roger Lyons.
18. Tom Rockelman took Zingerman to speak to Harold (last name unknown), Zingerman's Branch Manager.
19. Zingerman complained to Harold (last name unknown), Branch Manager, about the discrimination Zingerman was subjected to by Roger Lyons.
20. No action was taken by Harold (last name unknown).
21. On May 29, 1998, Zingerman was injured on-the-job and required surgery as a result thereof. Following surgery, co-employee, Don Underwood, telephoned Zingerman, telling Zingerman that Zingerman should not return to work as Roger Lyons was going to make work difficult for Zingerman and that Roger had instructed Don Underwood not to help Zingerman.
22. Bill Casey, Zingerman's Union Agent, told Zingerman to forget about whatever had happened.
23. When Zingerman's doctor gave Zingerman permission to return to work following surgery, Roger Lyons told Zingerman there were no jobs available for Zingerman.
24. Zingerman subsequently needed a second surgery following Zingerman's May 29, 1998 on-the-job injury.
25. On May 16, 2001, Zingerman's doctor gave Zingerman permission to return to work. Zingerman was again informed by Roger Lyons there were no jobs available for Zingerman.

and Zingerman's employment was terminated.

26. Freeman retaliated against Zingerman because of Zingerman's opposition to discrimination against Zingerman, by engaging in the following behavior:
  - A. Removing Zingerman's workbench.
  - B. Telling Zingerman "D.P.s (Displaced Persons) don't need benches."
  - C. Zingerman's Supervisor, Roger Lyons, told Zingerman "I hate the D.P. and Jew."
  - D. Zingerman's Supervisor, Roger Lyons, knew Zingerman had some difficulty reading and writing English and instructed other employees not to help Zingerman with tasks involving reading and writing English.
  - E. Zingerman complained to Bill Casey, Plaintiff's Union Agent, about the discrimination, but no action was taken by Bill Casey.
  - F. Zingerman complained to Harold (last name unknown), Branch Manager, about the discrimination, but no action was taken by Harold (last name unknown).
27. Freeman terminated Zingerman because of Zingerman's religion, national origin and opposition to discrimination.
28. Freeman interfered with Zingerman's ability to do his job.
29. Zingerman opposed the discrimination.
30. Freeman retaliated against Zingerman on May 29, 1998 by stating Zingerman's Supervisor was going to make work difficult for Zingerman and had instructed an employee, Don Underwood, not to help Zingerman.
31. Freeman retaliated against Zingerman by discharging Zingerman on May 16, 2001.
32. On May 16, 2001, Zingerman was terminated by Freeman without just cause.
33. Zingerman has not received compensation from Freeman since the termination.
34. As a result of the retaliation, Zingerman has lost in excess of \$40,000.00 in income and benefits.
35. As a result of the retaliation, Zingerman has suffered anguish, emotional trauma, pain and suffering.
36. As a result of the retaliation, Zingerman has incurred substantial legal fees and costs in prosecution of this matter and will continue to incur substantial attorney fees and costs in the future which are anticipated to be in excess of \$50,000.

37. Freeman is a corporation with its principal place of business in Cook County, Illinois.
38. Freeman is engaged in manufacturing products which is an industry affecting commerce and, at all relevant times hereto, was an employer subject to the jurisdiction of this Court.
39. Zingerman has complied with all administrative prerequisites by filing timely a Charge of Discrimination based on religion, national origin, retaliation and hostile work environment with the EEOC on January 14, 2002. A copy of the Charge is attached as Exhibit "A" and incorporated herein.
40. Several days after May 29, 2002, Zingerman received a Determination And Notice Of Right To Sue from the EEOC. A copy of the Determination is attached as Exhibit "B" and incorporated herein.
41. Zingerman was terminated by Freeman as a result of Zingerman's religion, being Jewish and national origin, Russian.
42. Freeman had no legitimate reason for termination of Zingerman.
43. By terminating Zingerman, Freeman willfully and intentionally discriminated against Zingerman on the basis of his religion.
44. Further, by terminating Zingerman's employment, Defendant knew and/or showed reckless disregard for the matter of whether its conduct violated the Acts.
45. As a result of the unlawful and willful acts complained of herein, Zingerman has suffered loss of employment, wages, benefits and other compensation.
46. Zingerman was terminated by Employer as a result of Zingerman's religion and national origin.
47. Employer had no legitimate reason for termination of Zingerman.
48. By terminating Zingerman, Employer willfully and intentionally discriminated against Zingerman on the basis of his religion and/or national origin.
49. Further, by terminating Zingerman's employments, Defendant knew and/or showed reckless disregard for whether its conduct violated the Acts.
50. As a result of the unlawful and willful acts complained of herein, Zingerman has suffered loss of employments, wages, benefits and other compensation.

Wherefore, Zingerman respectfully requests this Court enter judgment granting Zingerman the following:

- A. Payment of all back pay employee benefits and pension benefits in excess of



\$40,000.00.

- B. Front pay and all prospective lost benefits.
- C. Compensatory damages of \$300,00.00 or more in actual damages for pain and suffering.
- D. Reinstatement to his prior position.
- E. Punitive damages of \$300,000.00 or more.
- F. An award for liquidated damages, attorney fees and costs and any other relief this Court deems appropriate.

Jack Zingerman

By: Robert S. Pinzur  
One of his attorneys

Pinzur & Hartstein, Ltd.  
Attorney No. 3122002  
Attorney for Plaintiff  
Suite 208, 4180 RFD Route 83  
Long Grove, IL 60047  
847/821-5290  
847/821-5293 (fax)

## CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See Privacy Act Statement completing this form.

AGENCY

☐ FEPA  
☒ EEOC

CHARGE NUMBER

21CA201356

State of Illinois Department of Human Rights

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Mr. Jack Zingerman

HOME TELEPHONE (Include Area Code)

(847) 673-3044

STREET ADDRESS

CITY, STATE AND ZIP CODE

6726 North Avers, Lincolnwood, IL 60712

DATE OF BIRTH

04 / 25 / 1948

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

Freeman Decorating Co.

NUMBER OF EMPLOYEES, MEMBERS

15+

TELEPHONE (Include Area Code)

(773) 379-5040

STREET ADDRESS

CITY, STATE AND ZIP CODE

5040 West Roosevelt Road, Chicago, IL 60644

COUNTY

Cook

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐ RACE☐ COLOR☐ SEX☒ RELIGION☒ NATIONAL ORIGIN☒ RETALIATION☐ AGE☐ DISABILITY☒ OTHER (Specify)

Hostile Work Environment

DATE DISCRIMINATION TOOK PLACE

EARLIEST

LATEST

/ / 1995 05 / 16 / 2001

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

See Exhibit "A" attached hereto and made a part hereof.

JAN 14 2002

EXHIBIT "A"

Claimant is represented by Pinzur & Hartstein, Ltd., Attorneys At Law, 4180 RFD Route 83, Suite 208, Long Grove, IL 60047, 847/821-5290. Fax: 847/821-5293. All communications are requested through Pinzur & Hartstein, Ltd.

☒ I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

NOTARY (When necessary for State and Local Requirements)

*Dorinda Block Byron*  
 I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

*Zingerman*

EXHIBIT "A"

- I. I am a Russian immigrant and was employed by Freeman Decorating Co. ("Employer") as a carpenter beginning in September, 1994. Beginning in approximately 1995, I was discriminated against on the basis of my religion, Judaism, and my national origin, Russian, subjected to a hostile work environment and retaliated against for opposing discrimination by being discharged in May, 2001. I believe my discharge was also in retaliation for my pending worker's compensation claim resulting from my on-the-job injury in 1998. My immediate supervisor was Roger Lyons.
- II. Employer told me there were no jobs available for me.
- III. I believe I have been discriminated against on the basis of religion and national origin, subjected to a hostile work environment and retaliated against for opposing discrimination in that:
  - A. I performed my job satisfactorily at all times since my hire.
  - B. My supervisor, Roger Lyons, treated me unfairly in that prior to becoming my supervisor, Roger told employee Jerry Gordowicz that when he became a supervisor, Roger intended to "get rid of" a couple of D.P.s (Displaced Persons), including me, and give jobs to his family and friends.
  - C. Many of my co-workers used workbenches in the course of performing their jobs. After Roger Lyons became my supervisor, Roger Lyons had the workbench which I was using removed and told me that "D.P.s don't need benches."
  - D. Roger Lyons told me "I hate the D.P. and Jew."
  - E. One of my job responsibilities included working with an aluminum saw. On a particular occasion while I was working with the aluminum saw, I noticed that six crates of brand new aluminum, known as "P31", had been thrown into the garbage dumpster by an unknown person. I removed the brand new metal and used it in the course of my job in an attempt to save money for Employer. When Tom Rockelman, floor manager, saw that employees had wasted the metal and thrown it away, Tom asked me who had placed the metal into the dumpster. I told Tom I did not know. Following my conversation with Tom regarding the wasted metal, Tom Rockelman called Roger Lyons into his office for a meeting. Upon leaving the meeting, Roger Lyons told me I could no longer work the saw and shortly thereafter gave that job to one of Roger's relatives.
  - F. A number of employees had a parking space reserved for their exclusive use during work hours. I did not initially have a reserved parking space. When a parking space became available as the result of an employee leaving the company, I was assigned

a parking space for my exclusive use. Following assignment of the parking space to me, Roger Lyons gave my parking space to another employee with no explanation or notice to me. I complained to Harold (last name unknown), Branch Manager, and Harold (last name unknown) gave me back my parking space.

- G. I have some difficulty reading and writing English. Roger Lyons was well aware of this and instructed other employees not to let anyone help me with tasks involving reading and writing English.
- H. I complained to Bill Casey, union agent, about the discrimination I was subjected to by Roger Lyons. No action was taken by Bill Casey.
- I. I complained to Tom Rockelman about the discrimination I was subjected to by Roger Lyons. Tom Rockelman took me to speak to Harold (last name unknown), Branch Manager.
- J. I complained to Harold (last name unknown), Branch Manager, about the discrimination I was subjected to by Roger Lyons. No action was taken by Harold (last name unknown).
- K. On May 29, 1998, I was injured on-the-job and required surgery as a result thereof. Following surgery, employee Don Underwood telephoned me, telling me I should not return to work as Roger Lyons was going to make work difficult for me and that Roger had instructed Don not to help me.
- L. I complained to Bill Casey, union agent, about ongoing discrimination by Roger Lyons and Bill Casey told me to forget about whatever had happened and took no action.
- M. When my doctor gave me permission to return to work following surgery, Roger Lyons told me there were no jobs available for me.
- N. I subsequently needed a second surgery following my May 29, 1998 on-the-job injury.
- O. On May 16, 2001, my doctor gave me permission to return to work. I was again informed by Roger Lyons there were no jobs available for me and my employment was terminated.

Employer's actions constituted religious and national origin discrimination, creation of a hostile work environment and retaliation for opposing discrimination as well as retaliation for my pending worker's compensation claim resulting from my on-the-job injury in 1998.

## Equal Employment Opportunity Commission

## DISMISSAL AND NOTICE OF RIGHTS

To: Jack Zingerman  
6726 N. Avers  
Lincolnwood, IL 60712

From: Equal Employment Opportunity Commission  
500 West Madison  
Suite 2800  
Chicago, Illinois 60661

Certified No.: 7099 3400 0006 7301 3994

[ ] *On behalf of a person aggrieved whose identity is  
CONFIDENTIAL (29 CFR § 1601.7(a))*

Charge No.  
210A201356

EEOC Representative  
Y. Macariola-Wolohan, Investigator

Telephone No.  
(312) 886-4821

(See the additional information attached to this form.)

## YOUR CHARGE IS DISMISSED FOR THE FOLLOWING REASON:

- [ ] The facts you allege fail to state a claim under any of the statutes enforced by the Commission
- [ ] Respondent employs less than the required number of employees.
- [ ] Your charge was not timely filed with the Commission, *i.e.*, you waited too long after the date(s) of the discrimination you alleged to file your charge. Because it was filed outside the time limit prescribed by law, the Commission cannot investigate your allegations.
- [ ] You failed to provide requested information, failed or refused to appear or to be available for necessary interviews/conferences, or otherwise refused to cooperate to the extent that the Commission has been unable to resolve your charge. You have had more than 30 days in which to respond to our final written request.
- [ ] The Commission has made reasonable efforts to locate you and has been unable to do so. You have had at least 30 days in which to respond to a notice sent to your last known address.
- [ ] The respondent has made a reasonable settlement offer which affords full relief for the harm you alleged. At least 30 days have expired since you received actual notice of this settlement offer.
- [ X ] The Commission issues the following determination: Based upon the Commission's investigation, the Commission is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- [ ] Other (*briefly state*) \_\_\_\_\_

## - NOTICE OF SUIT RIGHTS -

- [ X ] **Title VII and/or the Americans with Disabilities Act:** This is your NOTICE OF RIGHT TO SUE, which terminates the Commission's processing of your charge. If you want to pursue your charge further, you have the right to sue the respondent(s) named in your charge in a court of competent jurisdiction. If you decide to sue, you must sue WITHIN 90 DAYS from your receipt of this Notice; otherwise your right to sue is lost.
- [ ] **Age Discrimination in Employment Act:** This is your NOTICE OF DISMISSAL OR TERMINATION, which terminates processing of your charge. If you want to pursue your charge further, you have the right to sue the respondent(s) named in your charge in a court of competent jurisdiction. If you decide to sue, you must sue WITHIN 90 DAYS from your receipt of this Notice; otherwise your right to sue is lost.
- [ ] **Equal Pay Act (EPA):** EPA suits must be brought within 2 years (3 years for willful violations) of the alleged EPA underpayment.

On behalf of the Commission

5-29-02

John P. Rowe

John P. Rowe, District Director

## Enclosures

Information Sheets  
Copy of Charge

cc: Respondent(s)

Freeman Decorating Company

EEOC Form 161 (Test 5/95)

EXHIBIT "B"

JS 44  
(Rev. 12/96)

## CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

Jack Zingerman

## DEFENDANTS

Freeman Decorating Co.

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Cook  
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT Cook

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Pinzur & Hartstein, Ltd.  
4180 RFD Route 83, Suite 208  
Long Grove, IL 60047  
847/821-5290

ATTORNEYS (IF KNOWN)

JUDGE COAR

MAGISTRATE JUDGE DENLOW

## II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- |   |                            |   |                            |
|---|----------------------------|---|----------------------------|
| PTF                                     | DEF                        | PTF   | DEF                        |
| <input type="checkbox"/> 1              | <input type="checkbox"/> 1 | <input type="checkbox"/> 4                                    | <input type="checkbox"/> 4 |
| Citizen of This State                   |                            | Incorporated or Principal Place of Business In This State     |                            |
| <input type="checkbox"/> 2              | <input type="checkbox"/> 2 | <input type="checkbox"/> 5                                    | <input type="checkbox"/> 5 |
| Citizen of Another State                |                            | Incorporated and Principal Place of Business In Another State |                            |
| <input type="checkbox"/> 3              | <input type="checkbox"/> 3 | <input type="checkbox"/> 6                                    | <input type="checkbox"/> 6 |
| Citizen or Subject of a Foreign Country |                            | Foreign Nation  |                            |

## IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

## V. NATURE OF SUIT

(PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury  <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability  <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth In Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 990 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>HABEAS CORPUS:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609

## VI. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. Title VII of the Civil Rights Act of 1964, 42 USC Sec. 2000e, et seq., Civil Rights Act of 1961, The Illinois Human Rights Act (IHRA), 775 ILCS 5/1-101, et seq., First Amendment of the United States Constitution, Article I, section 3, of the Illinois Constitution, Religious Freedom Restoration Act of 1993, Discrimination based on religion, national origin

## VII. REQUESTED IN COMPLAINT

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 ☐ DEMAND \$ in excess of \$600,000.00 CHECK YES only if demanded in complaint ☒ YES ☐ NO

## VIII. This case

☒ is not a refiling of a previously dismissed action.☐ is a refiling of case number \_\_\_\_\_, previously dismissed by Judge \_\_\_\_\_

DATE

8/23/02

SIGNATURE OF ATTORNEY OF RECORD

Robert S. Pinzur



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

In the Matter of

Jack Zingerman

VS.

Freeman Decorating Co.

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Jack Zingerman

Case Number:

02C 605

JUDGE COAR

MAGISTRATE JUDGE DENLO

(A)		(B)	
SIGNATURE <i>Robert S. Pinzur</i>		SIGNATURE <i>Elliott D. Hartstein</i>	
NAME Robert S. Pinzur		NAME Elliott D. Hartstein	
FIRM Pinzur & Hartstein, Ltd.		FIRM Pinzur & Hartstein, Ltd.	
STREET ADDRESS 4180 RFD Route 83, Suite 208		STREET ADDRESS 4180 RFD Route 83, Suite 208	
CITY/STATE/ZIP Long Grove, IL 60047		CITY/STATE/ZIP Long Grove, IL 60047	
TELEPHONE NUMBER 847-821-5290	FAX NUMBER 847-821-5293	TELEPHONE NUMBER 847-821-5290	FAX NUMBER 847-821-5293
E-MAIL ADDRESS PandHLaw@aol.com		E-MAIL ADDRESS PandHLaw@aol.com	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 3122002		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 1147099	
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TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE <i>Laura E. Cohen</i>		SIGNATURE <i>Barbara B. Bryan</i>	
NAME Laura E. Cohen		NAME Barbara B. Bryan	
FIRM Pinzur & Hartstein, Ltd.		FIRM Pinzur & Hartstein, Ltd.	
STREET ADDRESS 4180 RFD Route 83, Suite 208		STREET ADDRESS 4180 RFD Route 83, Suite 208	
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TELEPHONE NUMBER 847-821-5290	FAX NUMBER 847-821-5293	TELEPHONE NUMBER 847-821-5290	FAX NUMBER 847-821-5293
E-MAIL ADDRESS PandHLaw@aol.com		E-MAIL ADDRESS PandHLaw@aol.com	
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TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

FILED-ED4

In the Matter of

Jack Zingerman

VS.

Freeman Decorating Co.


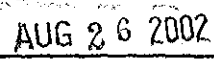
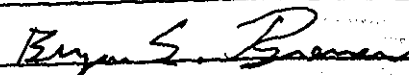
02 AUG 23 PM 3:43

U.S. DISTRICT COURT Case Number:

02C 6050  
JUDGE COAR  
MAGISTRATE JUDGE DENLO

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Jack Zingerman

(E)		DOCKETED (F)	
SIGNATURE 		SIGNATURE 	
NAME Megan L. Kerr		NAME	
FIRM Pinzur & Hartstein, Ltd.		FIRM	
STREET ADDRESS 4180 RFD Route 83, Suite 208		STREET ADDRESS	
CITY/STATE/ZIP Long Grove, IL 60047		CITY/STATE/ZIP	
TELEPHONE NUMBER 847-821-5290	FAX NUMBER 847-821-5293	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS PandHLaw@aol.com		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6257102		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
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TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(G)		(H)	
SIGNATURE 		SIGNATURE	
NAME Brian S. Brewer		NAME	
FIRM Pinzur & Hartstein, Ltd.		FIRM	
STREET ADDRESS 4180 RFD Route 83, Suite 208		STREET ADDRESS	
CITY/STATE/ZIP Long Grove, IL 60047		CITY/STATE/ZIP	
TELEPHONE NUMBER 847/821-5290	FAX NUMBER 847/821-5293	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS PandHLaw@aol.com		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6274618		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	